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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TATIANA MARTINEZ SANTALLA, an
individual,

Plaintiff,

v.

99 CENTS ONLY STORES LLC; KARLA
LNU; DOE PROPERTY OWNER I-V;
ROE PROPERTY OWNER I-V; DOE
JANITORIAL EMPLOYEE I-V; ROE
JANITORIAL COMPANY I-V; ROE
MAINTENANCE COMPANY I-V; ROE
PROPERTY MANAGEMENT COMPANY
IV; DOE MAINTENANCE WORKER I-V;
DOE PROPERTY MANAGER I-V; DOE
EMPLOYEE I-V; ROE EMPLOYER I-V;
and ROE COMPANIES I-V, inclusive,
jointly and severally,

Defendants.

CASE NO.: 2:22-cv-00824-CDS-DJA

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES

[THIRD REQUEST]

SUBMITTED IN COMPLIANCE WITH
LR26-1(e)

The parties, by and through their counsel, and through their respective counsel, and pursuant to Local Rule 26-3, stipulate to modify their discovery plan as follows:

1. Plaintiff filed her Complaint in the Eighth Judicial District Court for Clark County, Nevada on April 11, 2022.

2. Defendants removed said case to the U.S. District Court for the District of Nevada on May 24, 2022 (ECF No. 1).

1 3. The parties held their FRCP 26(f) conference on June 15, 2022, and in compliance
2 with FRCP 26(f) and LR 26-1(e) filed their initial Stipulated Discovery Plan and Scheduling
3 Order on June 15, 2022 (ECF No. 9).

4 4. On June 17, 2022, the Magistrate Judge established a stipulated discovery plan
5 (ECF No. 10).

6 5. In compliance with Local Rule 26-3, the parties provide the following information
7 regarding the discovery status:

8 a. Discovery Completed, per LR 26-3(a):

- 9 • The parties have exchanged initial disclosures, and supplements, of witnesses and
10 documents, pursuant to Fed.R.Civ.P.26(a) between May 11, 2022 and July 18,
11 2023.
- 12 • Defendant has received signed medical authorizations, and has begun the process
13 of independently obtaining Plaintiff's medical records arising out of the subject
14 incident.
- 15 • Defendant deposed Plaintiff Tatiana Martinez Santillan on September 22, 2022.
- 16 • Plaintiff and Defendant have served and responded to written discovery requests.
- 17 • Witness Lance Kimball was deposed on January 13, 2023.
- 18 • Defendant F.R.C.P. 30(b)(6) was deposed on June 22, 2023.
- 19 • Defendant has disclosed its Initial Experts.
- 20 • Plaintiff has disclosed her Initial Experts.
- 21 • Defendant has disclosed its Rebuttal Experts.
- 22 • Plaintiff has disclosed her Rebuttal Experts.

23 b. Discovery that remains to be completed:

24 Additional time is needed for depositions of expert witnesses and percipient witnesses.
25 Additional written discovery to Plaintiff and Defendant as deemed necessary following the
26 remaining depositions. The parties have agreed to a mediation pending scheduling confirmation
27 and seek the additional time to conduct any and all remaining discovery should it be necessary
28 following the agreed to mediation.

c. Reasons why discovery was not completed: The parties' current Discovery Plan and Scheduling Order does not allow enough time to conduct the remaining discovery should it be necessary following the agreed to mediation. Additional time for discovery is necessary to avoid prejudice, costs, and to facilitate a fair and just investigation of Plaintiff's claims against Defendant. The Parties also intend to extend initial and rebuttal expert disclosures in hopes of reaching a settlement.

d. Proposed schedule for completion of remaining discovery (extension of remaining deadlines by approximately 60 days):

	<u>Old Deadlines</u>	<u>New Deadlines</u>
Amend Pleadings or Add Parties:	12/12/2022	---
Initial Expert Disclosure per FRCP 26(a)(2):	June 12, 2023	---
Rebuttal Expert Disclosure:	July 14, 2023	---
Close of Discovery:	August 11, 2023	October 13, 2023
Submit Dispositive Motions:	September 11, 2023	November 10, 2023
Joint Pre-Trial Order:	October 9, 2023	December 8, 2023

WHEREFORE, the parties respectfully request that this Court extend the discovery period by sixty (60) days from the current deadline as outlined in accordance with the proposed dates above.

DATED this 19th day of July, 2023

GINA CORENA & ASSOCIATES

DATED this 19th day of July, 2023

BRANDON | SMERBER LAW FIRM

/s/ Mahna Pourshaban
Mahna Pourshaban, Esq.
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 300 S. Fourth Street, Suite 1400
 Las Vegas, Nevada 89101
Attorneys for Plaintiff

/s/ Jeffrey J. Orr
Jeffrey J. Orr Esq.
 Nevada Bar No. 7854
 139 E. Warm Springs Road
 Las Vegas, Nevada 89119
Attorney for Defendant 99 Cents Only Stores, LLC

CASE NO.: 2:22-cv-00824-CDS-DJA
STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
[THIRD REQUEST]

IT IS SO ORDERED:

	<u>Old Deadlines</u>	<u>New Deadlines</u>
Amend Pleadings or Add Parties:	12/12/2022	---
Initial Expert Disclosure per FRCP 26(a)(2):	June 12, 2023	---
Rebuttal Expert Disclosure:	July 14, 2023	---
Close of Discovery:	August 11, 2023	October 13, 2023
Submit Dispositive Motions:	September 11, 2023	November 10, 2023
Joint Pre-Trial Order:	October 9, 2023	December 8, 2023



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: July 24, 2023

Eva Rodriguez Dhimi

From: Jeffrey Orr <j.orr@bsnv.law>
Sent: Thursday, July 20, 2023 7:00 AM
To: Mahna Pourshaban
Cc: Eva Rodriguez Dhimi
Subject: FW: Martinez Santalla v. 99 Cents
Attachments: 7.19.23 Stipulatino and Order to Extend Deadlines (Third Request).final.mp.doc

You may affix my e-signature to the attached stipulation

JEFFREY J. ORR, ESQ.
BRANDON | SMERBER LAW FIRM
139 E. WARM SPRINGS RD.
LAS VEGAS, NEVADA 89119
TEL. 702-380-0007
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From: Mahna Pourshaban <Mahna@lawofficecorena.com>
Sent: Wednesday, July 19, 2023 7:47 PM
To: Eva Rodriguez Dhimi <eva@lawofficecorena.com>; Jeffrey Orr <j.orr@bsnv.law>
Cc: Maybelline Valle <M.Valle@bsnv.law>
Subject: RE: Martinez Santalla v. 99 Cents

Hi Jeff,

Please see attached.

Best regards,



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